

**VIA ELECTRONIC CASE FILING**

November 19, 2024

Honorable Justin T. Quinn, U.S.M.J.  
 U.S. District Court for the District of New Jersey  
 Clarkson S. Fisher Building and Courthouse  
 402 East State Street  
 Trenton, NJ 08608

**Re: *His All Holiness et al. v. Princeton Univ.* Case No. 3:18-CV-17195-RK-JTQ**

Dear Judge Quinn:

Defendant, the Trustees of Princeton University (“Princeton”), writes pursuant to the order dated Nov. 13, 2024 [ECF 172], which asked the parties to file letters addressing whether Plaintiffs, His All Holiness Bartholomew I (the “Patriarch”), the Holy Metropolis of Drama (the “Metropolis”), and the Monastery of Theotokos Eikosiphoinissa (the “Monastery”), complied with the Oct. 10, 2024, Order (the “Order”) [ECF 167]. As detailed herein, **Plaintiffs failed to comply with the Order.**

**Patriarch’s noncompliance.** The Patriarch, who has supreme authority over the Metropolis and the Monastery, refuses to make any personal effort to comply with the Order, now or in the future—and he does so on the same First Amendment grounds the Court previously rejected. [ECF 122 at 11.] Plaintiffs concede that if the Patriarch complied with the Order, Prof. George Papazoglou (the “Professor”) would sit for deposition. [ECF 171 at 2.] This has been Princeton’s point all along—Plaintiffs could produce the Professor if they desired. This was also the basis for the Order compelling Plaintiffs to utilize “best efforts” to produce the Professor. Respectfully, Princeton did not bring itself to Court. The Patriarch personally instituted this lawsuit in the United States. Princeton greatly respects His All Holiness, but his refusal to comply is an unjustified violation of the Court’s Order.<sup>1</sup>

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<sup>1</sup> The Monastery falls under the direct ecclesiastic authority of the Patriarch and the Metropolis. These entities control the Monastery. Their noncompliance is, likewise, imputed to the Monastery.

**Metropolis's noncompliance.** The Metropolis is not in compliance with the Order regarding the Professor's deposition.<sup>2</sup> Thus far, the Metropolitan has failed to personally visit the Professor, during which visit the Metropolitan was ordered to request that the Professor sit for deposition and warn him of the potential consequences for refusing to do so (the "Request & Advice"). To Princeton's knowledge, the Metropolis has also failed to speak with the Professor over the phone.

**Monastery's noncompliance.** The Monastery's Abbess e-mailed the Professor. Princeton has not received a copy of this communication to ensure it complies with the Order. It does not appear that any of the primary Sisters of the Monastery (including the Abbess) spoke with the Professor to communicate the Request & Advice. Rather, an unidentified nun apparently spoke with the Professor.

In sum, none of the Plaintiffs spoke with the Professor, or met with him in person—as Ordered—and the Patriarch has refused to comply entirely despite acknowledging that his efforts would likely result in the Professor's deposition. Plaintiffs have not used their "best efforts" to secure the Professor's deposition. The Court made very clear at the hearing that Plaintiffs had not made their "best efforts" to comply with the Order and gave Plaintiffs a final chance to do so with clear instructions. Since Plaintiffs have failed to do so, the Preclusionary Sanctions requested by Princeton should be granted. [ECF 155 & 161.]

Respectfully submitted,

**WONG FLEMING**

**HAHN LOESER & PARKS LLP**

By:     /s/Linda Wong      
Linda Wong

By:     /s/Samuel Sneed      
Samuel Sneed

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<sup>2</sup> The Metropolis did comply with the Order's direction to obtain information from the Professor concerning the "30 Year Email." To date, Princeton has not been provided with the written communication which prompted the Professor to provide this information. Hence, Princeton is unable to ascertain why the Metropolis only partially complied with the Order.